SM

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November 30, 2020

Louisiana Ethics Administration Program P.O. Box 4368
Baton Rouge, Louisiana 70821

RE: REQUEST FOR AN ADVISORY OPINION

Dear Sir/Madame:

Please accept this letter as a request for clarification and guidance as to the extent of the postemployment prohibitions imposed on me pursuant to La. R.S. 27:13 (and as otherwise provided in Louisiana laws and regulations) as the former Chairperson of the Louisiana Gaming Control Board ("LGCB").

In particular, while an offer has yet to be extended for a relationship, I have been approached by an entity from outside the United States which is currently not licensed or operational in Louisiana. I had absolutely no interaction or relations with this entity while I was on the Board at any time nor was the entity licensed to conduct business in Louisiana during my term of service. Indeed as of this date, the entity has not been licensed in Louisiana nor is there a pending application for licensure in this state. Moreover, during my seven year term on the Board I had no communications directly or indirectly with any employee, agent or representative who during that time was associated with the entity.

The entity is discussing creating an advisory board made up of former regulators from several states to advise the company on best practices relating to gaming regulatory policies in the United States and otherwise providing advice to the company on regulatory and gaming issues. There will be a monthly retainer related to serving on the Advisory Board plus reimbursement of expenses. Any role on the Advisory Board would not involve the entity using me to appear before the LGCB or otherwise to lobby before the Louisiana legislature or other branch of Louisiana government. Rather, as proposed, the role would relate to me using my regulatory background to assist the company in establishing best practices generally through the Advisory Board and input of myself and other former regulators from other states. It is possible that the entity may subsequently get involved in the Louisiana gaming markets thus requiring licensure by the LGCB, but they have made it clear that such potential licensure would not require my representation on their behalf before the LGCB, the legislature or any other subdivision of the executive branch.

Based on the statements above, I respectfully request guidance on the following two issues:

- 1. May I serve on the Advisory Board without violating the post-employment restrictions prescribed in La. R.S. 27:13 or other Louisiana laws or ethical provisions that apply to me as a former Chair of LGCB?
- 2. Assuming the answer to #1 is yes, would this relationship prevent the entity in question from subsequently seeking and receiving a license or permit from LGCB in Louisiana based on their relationship with me through the Advisory Board as they have indicated that they cannot risk hiring me for the Advisory Board if their licensure might be jeopardized?

I am available to answer any questions you may have and look forward to your guidance.

Sincerely,

Ronnie Jones

504.723.3712

